

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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EDWARD STELLINI, Derivatively on  
Behalf of Himself and All Others Similarly  
Situated,

: Civil Action No. 1:12-cv-03678-SAS  
ECF Case

Plaintiff,

vs.

WALTER P. HAVENSTEIN, A. THOMAS  
YOUNG, FRANCE A. CÓRDOVA, JERE  
A. DRUMMOND, THOMAS F. FRIST,  
JOHN J. HAMRE, MIRIAM E. JOHN,  
ANITA K. JONES, JOHN P. JUMPER,  
HARRY M.J. KRAEMER, JR.,  
LAWRENCE C. NUSSDORF, EDWARD J.  
SANDERSON, JR., and LOUIS A.  
SIMPSON,

Defendants,

-and-

SAIC, INC.,

Nominal Defendant.

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CHET MALANOWSKI, Derivatively on  
Behalf of SAIC, INC.,

: Civil Action No. 1:12-CV-02128-DAB  
ECF Case

Plaintiff,

vs.

GERARD DENAULT, KENNETH C.  
DAHLBERG, and MARK W. SOPP,

Defendants,

– and –

SAIC, INC.,

Nominal Party.

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MONTE WELCH, Derivatively on Behalf of  
SAIC, INC.,

Plaintiff,

vs.

WALTER P. HAVENSTEIN, A. THOMAS  
YOUNG, FRANCE A. CÓRDOVA, JERE  
A. DRUMMOND, THOMAS F. FRIST,  
JOHN J. HAMRE, MIRIAM E. JOHN,  
ANITA K. JONES, JOHN P. JUMPER,  
HARRY M.J. KRAEMER, JR.,  
LAWRENCE C. NUSSDORF, EDWARD J.  
SANDERSON, JR., LOUIS A SIMPSON,  
MARK W. SOPP, KENNETH C.  
DAHLBERG, CARL BELL, and GERARD  
DENAUT,

Defendants,

– and –

SAIC, INC.,

Nominal Party.

STEPHEN ROBACZYNSKI, Derivatively  
on Behalf Of Himself and All Others  
Similarly Situated,

Plaintiff,

vs.

WALTER P. HAVENSTEIN, A. THOMAS  
YOUNG, FRANCE A. CÓRDOVA, JERE  
A. DRUMMOND, THOMAS F. FRIST,  
JOHN J. HAMRE, MIRIAM E. JOHN,  
ANITA K. JONES, JOHN P. JUMPER,  
HARRY M.J. KRAEMER, JR.,  
LAWRENCE C. NUSSDORF, EDWARD J.  
SANDERSON, JR., and LOUIS A  
SIMPSON,

Defendants,

– and –

SAIC, INC.,

Nominal  
Defendant.

Civil Action No. 1:12-CV-02437-JPO  
ECF Case

Civil Action No. 1:12-CV-02772-JPO  
ECF Case

LOUISIANA MUNICIPAL POLICE  
EMPLOYEES' RETIREMENT SYSTEM,  
Derivatively on Behalf of Itself, and All  
Others Similarly Situated,

Civil Action No. 1:12-CV-03019-JPO  
ECF Case

Plaintiff,

vs.

WALTER P. HAVENSTEIN, A. THOMAS  
YOUNG, FRANCE A. CÓRDOVA, JERE  
A. DRUMMOND, THOMAS F. FRIST,  
JOHN J. HAMRE, MIRIAM E. JOHN,  
ANITA K. JONES, JOHN P. JUMPER,  
HARRY M.J. KRAEMER, JR.,  
LAWRENCE C. NUSSDORF, EDWARD J.  
SANDERSON, JR., and LOUIS A  
SIMPSON,

Defendants,

– and –

SAIC, INC.,

Nominal Defendant.

**DECLARATION OF EX KANO S. SAMS II IN SUPPORT OF PLAINTIFFS MONTE WELCH AND EDWARD STELLINI'S MOTION TO CONSOLIDATE ACTIONS, APPOINT CO-LEAD PLAINTIFFS, CREATE AN EXECUTIVE COMMITTEE, AND APPOINT CO-CHAIRS OF THE EXECUTIVE COMMITTEE**

I, Ex Kano S. Sams II, declare as follows:

1. I am an attorney duly licensed to practice law before all courts in the State of California and I am one of the counsel for Edward Stellini ("Stellini"). The matters stated within this declaration are based upon my personal knowledge and, if called upon, I could and would competently testify to them.

2. After the above-captioned complaints were filed, counsel for plaintiff Stellini contacted counsel for plaintiffs in the actions to discuss their orderly consolidation and leadership structure.

3. Mr. Stellini demonstrated his initiative to hold defendants accountable for the conduct alleged by directing counsel to file the first derivative complaint on behalf of SAIC to my knowledge related to the issues alleged.

4. To my knowledge, Mr. Stellini holds 54,936 shares of SAIC stock through his own holdings and those held on behalf of his wife.

5. Attached as Exhibit 1 is a true and correct copy of the Firm Resume for The Weiser Firm.

6. Attached as Exhibit 2 is a true and correct copy of the Firm Resume for Glancy Binkow & Goldberg LLP.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on this, the 15th day of May, 2012, in Los Angeles, California.



Ek Kano S. Sams II

**PROOF OF SERVICE BY ELECTRONIC POSTING  
PURSUANT TO SOUTHERN DISTRICT OF NEW YORK  
ECF AND LOCAL RULES AND BY MAIL  
ON ALL KNOWN NON-REGISTERED PARTIES**

I, the undersigned, say:

I am a citizen of the United States and am employed in the office of a member of the Bar of this Court. I am over the age of 18 and not a party to the within action. My business address is 1925 Century Park East, Suite 2100, Los Angeles, California 90067.

On May 15, 2012, I caused to be served the following document:

**DECLARATION OF EX KANO S. SAMS II IN SUPPORT OF PLAINTIFFS MONTE  
WELCH AND EDWARD STELLINI'S MOTION TO CONSOLIDATE ACTIONS,  
APPOINT CO-LEAD PLAINTIFFS, CREATE AN EXECUTIVE COMMITTEE, AND  
APPOINT CO-CHAIRS OF THE EXECUTIVE COMMITTEE**

By posting such document electronically to the ECF website of the United States District Court for the Southern District of New York, for receipt electronically by the parties listed on the attached Court's Service List.

And by **U.S. Mail** to all known non-ECF registered parties: By placing true and correct copies thereof in individual sealed envelopes, with postage thereon fully prepaid, which I deposited with my employer for collection and mailing by the United States Postal Service. I am readily familiar with my employer's practice for the collection and processing of correspondence for mailing with the United States Postal Service. In the ordinary course of business, this correspondence would be deposited by my employer with the United States Postal Service that same day.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on May 15, 2012, at Los Angeles, California.

*s/ Elizabeth M. Gonsiorowski*  
Elizabeth M. Gonsiorowski

**Mailing Information for a Case 1:12-cv-02437-JPO****Electronic Mail Notice List**

The following are those who are currently on the list to receive e-mail notices for this case.

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**Manual Notice List**

The following is the list of attorneys who are **not** on the list to receive e-mail notices for this case (who therefore require manual noticing). You may wish to use your mouse to select and copy this list into your word processing program in order to create notices or labels for these recipients.

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*For Defendants Walter P. Havenstein, A. Thomas Young, France A. Córdova, Jere A. Drummond, Thomas F. Frist, John J. Hamre, Miriam E. John, Anita K. Jones, John P. Jumper, Harry M.j. Kraemer, Jr., Lawrence C. Nussdorf, Edward J. Sanderson, Jr., and Louis A. Simpson*